

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN OF PENNSYLVANIA**

<u>In re</u>	:	CHAPTER 13 CASE
	:	
MOHAMMAD AHADI	:	
	:	BANKRUPTCY NO. 07-13160-sr
<u>Debtor.</u>	:	

**NOTICE OF ENTRY OF APPEARANCE COMBINED WITH DEMAND
FOR SERVICE OF PAPERS; GARY P. LIGHTMAN, ESQUIRE
FOR PARAMOUNT MORTGAGE & CAPITAL, LLC**

PLEASE TAKE NOTICE that Paramount Mortgage & Capital, LLC ("Paramount"), parties-in-interest in the above-captioned bankruptcy case ("Case"), appear in the Case by their attorney, Gary P. Lightman, Esquire, who hereby (i) enters his appearance pursuant to Fed. R. Bankr. Proc. 2010(b) and (ii) requests, pursuant to Fed R. Bankr. P. 2002, 9007, 2013, 9014 and §342 of Title 11 of the United States Code, 11 U.S.C. §101 et seq. (the "Bankruptcy Code"), that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned at the following address:

Gary P. Lightman, Esquire
Lightman & Manochi
1520 Locust Street, 12th Floor
Philadelphia, PA 19102
(215) 545-3000
garyplightman@lightmanlaw.com

Please take further notice that the foregoing demand includes not only the notices and papers referred to in the Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or information, written or oral, and whether transmitted or conveyed by mail, email, delivery, telephone, telegraph, telefax, or otherwise filed or made with regard to the referenced case and all proceedings therein.

This filing shall not be deemed or construed to be a waiver of Paramount's rights (i) to have final orders in noncore matters entered only after de novo review by a district judge, (ii) to trial by

jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) to have the district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, setoffs, or recoupments to which Paramount is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Paramount expressly reserve.

LIGHTMAN & MANOCHI

BY: Gary P. Lightman
GARY P. LIGHTMAN, ESQUIRE
Lightman & Manochi
1520 Locust Street, 12th Floor
Philadelphia, PA 19102
(215) 545-3000
garyplightman@lightmanlaw.com

Date: June 4, 2007

Attorneys for Paramount Mortgage & Capital, LLC

Paramount\Mohammed Ahadi\Entry of App & Req for Notices
0348-013